Case 2:23-mj-30340-DUTY ECF No. 1 PageID 1 Filed 08/17/23 Page 1 of 6 (313) 226-9100

AO 91 (Rev. 11/11) Criminal Complaint Special Agent:

Sean Callaghan

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America v.

Darrick WILLIAMS

Case No. Case: 2:23-mj-30340 Assigned To: Unassigned

Assign. Date: 8/17/2023

USA V. WILLIAMS (CMP)(CMC)

Telephone: (313) 965-2323

		C	RIMINAL CO	OMPLAINT			
I, the con	nplainant in this ca	se, state that	the following is	s true to the best of my k	knowledge	e and belief.	
On or abo	out the date(s) of _		07/07/2023	in the county	y of	Oakland	in the
Eastern	District of	Michigan	, the defer	ndant(s) violated:			
Code Section			Offense Description				
18 U.S.C. 2113(a)			Armed Bank F	Robbery			
18 U.S.C. 924(c)(ii)		Brandishing a	Firearm during a crime			
This crim	inal complaint is b	pased on thes	e facts:				
✓ Continued or	n the attached shee	t.	-	Special Agent Sean Callag	Kainant's sig	gnature	200
and/or by reliable ele		nce	-	Print	ted name an	d title	
Date: August 17, 2023			-	Judge's signature			
City and state: <u>Detr</u>	oit, Michigan			Hon. Kimber G. Altman, Print	U.S. Neted name an	Magistrate Judge d title	;

IN THE UNITED STATES DISTRICT COURT FOR EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT

- I, Sean Callaghan, being duly sworn, states as follows:
- 1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have investigated a variety of federal criminal violations, including violent crime, bank robberies, crimes against children and various financial crimes, for approximately 20 years. I am currently assigned to the Detroit Division, Oakland County Resident Agency.
- 2. The information contained in this affidavit is based on my personal knowledge and observations during the course of this investigation, reports that I have reviewed, documents and information provided by witnesses interviewed during this investigation. The witnesses who were interviewed by officers and agents pursuant to this investigation provided complete identification information which I maintain (none were anonymous sources). However, I am identifying them in this affidavit, which will become public, only by their initials to protect their identities. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I didn't include every fact I know concerning this investigation, but only the facts that I believe are necessary to establish probable

cause to believe that Darrick Williams committed armed bank robbery in violation of Title 18 U.S.C. Section 2113(a) and during the commission of that crime used, carried and brandished a firearm in violation of Title 18 U.S.C. Section 924(c)(ii).

PROBABLE CAUSE

- 3. On July 7, 2023, at approximately 3:42pm, an individual wearing a mask, black gloves, a gray Nike hooded sweatshirt and dark sneakers/sweatpants entered the First Merchants Bank branch located at 44350 Twelve Mile Road, Novi, Michigan (Eastern District of Michigan) armed with a two-tone handgun. Witnesses J.M. and K.J. indicated that they believed this individual to be a male approximately 6'03" in height. A bank employee, S.S., approached this individual and stated "excuse me sir, can I help you." The suspect then pulled out a handgun and said, "this is a robbery, give me your money." The suspect then walked toward a teller counter and said, "give me your money, all of it" To another bank employee, R.E. The suspect placed a plastic shopping bag on the counter and stated, "give it to me, all of it, all of it." Employees complied with the suspect's demands and provided approximately \$4,000.00 in U.S. Currency. The suspect took the bag filled with money, exited the bank and fled on foot.
- 4. On August 16, 2023, at approximately 2:08pm, a suspect wearing near identical clothing—a mask, black gloves, a gray Nike hooded sweatshirt and dark sneakers/sweatpants entered the Chase Bank branch located at 29750 S. Wixom

Road, Wixom, Michigan (Eastern District of Michigan). Bank employees R.E. and D.H. advised that there were no other customers inside the bank. R.E. and D.H. were sitting up front near the main entrance of the bank when they saw a subject walking along the south side of the bank. The suspect entered the bank and immediately walked toward two ATMs in the rear of the bank. The suspect entered R.E.'s office and stated, "I'm robbing this bank." The suspect then removed his hands from the pockets of the hooded sweatshirt and brandished a handgun. R.E. walked with the suspect over to the ATM and entered a code into the ATM. The code R.E. entered is supposed to be for robbery incidents and automatically dispenses \$500.00 in cash. The suspect said, "I know there's more money in here." R.E. told the suspect that he can't dispense any more money. The suspect grabbed the money and exited the bank via the front doors.

5. Wixom Police responded to the scene of the robbery and a description of the suspect was broadcast over the radio. An officer responding to the scene observed a tall black male wearing black sweatpants, black shoes and a white shirt. This individual was also wearing a white surgical style mask and two head wraps. Officers approached this individual, subsequently identified as Darrick WILLIAMS, and asked him where he was coming from. WILLIAMS stated that he was coming from the Wendy's and indicated that he went there to use the restroom. Officers observed a bulge in WILLIAMS's front waistband and

conducted a pat down which revealed a handgun—a loaded Smith and Wesson, model, SDV9, two-tone black with a silver slide, 9mm semi-automatic pistol. The handgun had what appeared to be electrical tape covering the serial number. Police removed the tape and ran the serial number revealing that the handgun was registered to WILLIAMS. Police searched WILLIAMS's backpack subsequent to his arrest and discovered the hooded Nike sweatshirt and exactly \$500.00 in cash consisting of three one hundred dollar bills and ten twenty dollar bills.

- 6. Investigators reviewed surveillance images from the above listed bank robberies in Novi and Wixom. Those images reveal the robber to be the same height and build and wearing what appears to be identical pieces of clothing including masks, shoes and gloves in both robberies. Additionally, the images of the handgun used in both robberies reveal it to be the same make, Smith and Wesson, model, SDV9, two-tone black with a silver slide, 9mm semi-automatic pistol.
- 7. Both the First Merchants Bank branch located at 44350 Twelve Mile Road, Novi, Michigan and the Chase Bank branch located at 29750 S. Wixom Road, Wixom, Michigan are financial institutions whose deposits are insured by the Federal Deposit Insurance Corporation (FDIC).

CONCLUSION

8. Based on the foregoing, there is probable cause to believe that Darrick Williams committed the offense of armed bank robbery in violation of Title 18 U.S.C. Section 2113(a) and during the commission of that crime used, carried and brandished a firearm in violation of Title 18 U.S.C. Section 924(c)(ii).

Respectfully submitted,

Sean Callaghan

Special Agent, FBI

Sworn to before me and signed in my presence and/or by reliable electronic means.

Hon. Kimberly Altman

United States Magistrate Judge

Dated: August 17, 2023